

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**PROJECT PAPERLESS, LLC, a
Virginia Limited liability company,**

Plaintiff,

v.

**UAV COMMUNICATIONS, INC.
d/b/a BOSH GLOBAL SERVICES and
BOSH GLOBAL SYSTEMS, a Virginia
Corporation,**

Defendant.

Case No: 3:12-cv-00039-REP

**DEFENDANT’S SECOND CONSENT MOTION FOR AN EXTENSION OF TIME TO
FILE RESPONSIVE PLEADINGS TO PLAINTIFF’S COMPLAINT**

Defendant UAV Communications, Inc., d/b/a Bosh Global Services and Bosh Global Systems (“Bosh”), by counsel, states as follows for its Second Consent Motion for an Extension of Time to file Responsive Pleadings to Plaintiff’s Complaint:

1. Plaintiff Project Paperless, LLC (“Project Paperless”) filed its Complaint on Jan. 18, 2012.
2. On January 27, 2012, counsel for Bosh accepted service of the Complaint on behalf of Bosh, which would have required Bosh to respond to the complaint by Friday, February 17, 2012.
3. On February 7, 2012, counsel for Bosh filed a consent motion for a thirty-day extension of time to respond to the Complaint. (Docket No. 4). Counsel for Project Paperless had no objection to the extension and consented to the filing of the motion.
4. On February 14, 2012, the Court entered an Order (Docket No. 5) granting the

consent motion and thus providing Bosh up to and including March 19, 2012 in which to answer, plead and otherwise respond to the Complaint.

5. The parties have been engaged in good faith settlement negotiations. The negotiations have resulted in movement toward a mutual resolution of the matter without need of further litigation. As such, Bosh is seeking an extension of an additional ten (10) days, up to and including March 29, 2012, in which to respond to Plaintiff's Complaint.

6. Counsel for Plaintiff, Project Paperless, has no objection to an extension of an additional ten (10) days, up to and including March 29, 2012, in which to respond to Plaintiff's Complaint. As such, neither party will be prejudiced by the additional short extension of time.

7. This motion is filed prior to the expiration of time to answer, plead and otherwise respond under Rule 12(a) of the Federal Rules of Civil Procedure. This motion is not intended to waive any defenses that Bosh may have, including any challenges to jurisdiction or venue.

WHEREFORE, Bosh respectfully requests that this Court enter an Order permitting Bosh to file its responsive pleading on or before March 29, 2012.

Dated: March 15, 2012

Respectfully Submitted,

UAV COMMUNICATIONS, INC.

By : ____/s/____

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CERTIFICATE OF SERVICE

I hereby certify that on the March 15, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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